

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

VAUGHN NEITA,	)	
	)	Case No: 14 CV 1107
Plaintiff,	)	
v.	)	
	)	
CITY OF CHICAGO, et al.	)	
Defendants.	)	<b>Jury Demanded</b>

**DEFENDANTS' MOTION TO EXTEND WRITTEN DISCOVERY**  
**DEADLINES OF JANUARY 3, 2017 ORDER**

NOW COME Defendants Cherie Travis ("Travis"), Officer Jane Raddatz and Officer Melissa Uldrych ("Defendant Officers"), and City of Chicago by and through their attorneys Joseph Carlasare and Marcie Thorp of SmithAmundsen LLC, and for their Motion to Extend Deadlines of January 3, 2017 minute order, states as follows:

1. On January 3, 2017, Counsel reported that settlement efforts have been exhausted and it would not be fruitful to have further settlement discussions at this time. The Parties were in agreement that discovery should proceed. See Document #: 96.

2. This Court ordered Parties to respond to previously served written discovery by January 24, 2017. See Document #: 96. This Court further ordered, "[a]ny motions to compel written discovery are due by 2/7/2017, and will be argued on 2/9/2017 at 10 a.m. Parties were also ordered to file a joint status report by 2/7/2017. See Document #: 96.

3. Both Parties worked diligently to comply with this Court's January 3, 2017 minute order. Nevertheless, both Parties, *by agreement*, answered written discovery on January 30, 2017, which was approximately one week after the Court's deadlines.

4. Plaintiff produced more than 5,500 pages of documents. On February 5, 2017, Plaintiff's Counsel and Defense Counsel engaged in a one hour long Rule 37 Conference regarding alleged deficiencies in Defendants' answers to written discovery. No Rule 37 Conference regarding Plaintiff's answers to written discovery has yet been conducted. Plaintiff and Defense Counsel

are working in good faith to resolve certain issues.

5. Defense counsel has been engaged in other matters and was unable to review the over 5,500 pages produced and Plaintiff's answers to written discovery to properly assess whether a motion to compel additional written discovery is necessary. Given both Parties late disclosures, Defense Counsel is unable to meet the Court's deadline of February 7, 2017 to file a Motion to Compel.

6. As a result, Defense Counsel requests an extension of time to bring a motion to compel answers to written discovery as might be necessary. Moreover, Defense Counsel requests an extension of the status report deadline given the unresolved written discovery issues.

7. Defense counsel sought Plaintiff's counsel agreement to this discovery extension. Plaintiff's counsel did not voice an objection.

8. The instant Motion is not brought to harass, delay, or cause undue prejudice or inconvenience to the Court or any Party.

WHEREFORE Defendants Cherie Travis, Officer Jane Raddatz and Officer Melissa Uldrych, and City of Chicago request that this Honorable Court grant their Motion to Extend Deadline to file a motion to compel, and for any such other relief as this Honorable Court deems just and appropriate.

Respectfully submitted,

SmithAmundsen LLC

By: s/Joseph P. Carlasare  
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